

**# 21-cv-06584-CS**

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**COVER LETTER**

To: Office of the New York State Attorney General; Attn: **Bahiya Lawrence**, Assistant AG, 28 Liberty Street, New York, NY 10005 (via ECF/CM);

To: Attn: Clerk of **HON. Cathy Seibel**, US District Judge); US Courthouse, 300 Quarropas Street, White Plains, NY 10601 (copy for Court Records);

From: **Sanjay Tripathy**, 2013 Jadewood Drive, Morrisville, NC 27560;  
Email: [sanjay.tripathy@gmail.com](mailto:sanjay.tripathy@gmail.com); Tele: +1-859-380-1515;

Date: Monday, February 27th, 2023

Subject: **Case # 21-cv-06584-CS Plaintiff's First Discovery/Document Demands (Tripathy v. McClowski, et. al)**

Dear Ms. Lawrence,

Please find enclosed a copy of Plaintiff's first set of discovery and document demands in the above referenced matter, which was also mailed (CM/ECF) to the US District Court for the Southern District Court of New York today.

Very truly yours,

**/s/ Sanjay Tripathy**

Plaintiff/Petitioner ProSe

Enclosure: Discovery Demand; Certificate of Service;

**An innocent man, exonerated after 1651 days in illegal captivity, due to unconstitutional acts, religious persecutions perpetrated by The State of New York, and State Actors acting under the Color of Law;**

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**DISCOVERY DEMAND**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**SANJAY TRIPATHY,**

**Plaintiff,**

**PLAINTIFF'S FIRST SET OF  
DISCOVERY/DOCUMENT  
DEMANDS**

**-VS-**

**21-cv-06584-CS**

**ROBERT MCCLOWSKI, et. al.,  
Defendants.**

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Pursuant to Federal Rules of Civil Procedure, Rules 26 to 37 (Title V Disclosures and Discovery), and Local Rule of Civil Procedure 26, Plaintiff ProSe, requests that Defendant(s) via its Attorney (Bahiya Lawrence, Assistant AG of NYS AG of New York State) respond to the following document and discovery requests **within thirty (30) days of service (reference #140 Civil Case Discovery Plan and Scheduling Order)**.

Plaintiff incorporates the definitions and instructions in Rules 26 to 33 and 34 to 37 of the Federal Rules of Civil Procedure and Local Rule of Civil Procedure 26. Plaintiff does not seek any attorney client communications or attorney work product. Plaintiff reserves the right to seek further discovery (including but not limited to admissions, interrogatories, depositions), and will use Experts (Plaintiff), and at a time and as needed upon receipt, analysis and implications of the discovery material obtained, permissible and appropriate by the Court

**DISCOVERY/DOCUMENT REQUESTS:** All documents should be provided electronically via a secure server, where Plaintiff can access them (including ability to access and download). No physical form documents requested, unless they cannot be provided electronically.

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1. Please produce any and all documents and information in your (Defendants/DOCCS) knowledge and/or possession pertaining to the allegations in the complaint.
2. Please produce any and all documents, information and data pertaining to DOCCS food services and religious services policies, procedures, protocols towards inmates (or staff), including but not limited to its implementation, monitoring, reporting etc., (including but not limited to sourcing, preparation, packaging, shipping, reheat, serving, kitchen, consumption in mess hall by facility and overall across DOCCS) as it pertains to this complaint.
3. Please produce any and all documents, information and data pertaining to DOCCS food services and religious services food services policies, procedures, protocols towards inmates (or staff), including but not limited to its implementation, monitoring, reporting etc., towards use and serving of Pork food products (Pork not being part of the inmate menu) removal from the inmate mess hall (including but not limited to sourcing, preparation, packaging, shipping, reheat, serving, kitchen, consumption in mess hall by facility and overall across DOCCS) as it pertains to this complaint.
4. Please produce any and all documents, information and data pertaining to DOCCS food services and religious services food services policies, procedures, protocols towards inmates (or staff), including but not limited to its implementation, monitoring, reporting etc., towards use and serving of Beef food products (Beef being part of the inmate menu) served in the inmate mess hall (including but not limited to sourcing, preparation, packaging, shipping, reheat, serving, kitchen, consumption in mess hall by facility and overall across DOCCS) as it pertains to this complaint.
5. Please produce any and all documents, information and data pertaining to DOCCS food services and religious services policies, procedures, protocols towards inmates (or staff), including but not limited to its implementation, monitoring, reporting etc., as related to food prepared (at DOCCS Kosher Kitchen; food preparation facility at Green Haven CF or similar including but not limited to sourcing, preparation, packaging, shipping, reheat, serving, kitchen, consumption in mess hall by facility and overall across DOCCS) where there is no Pork (food products) cooked, handled or brought in, especially for Muslim/Jewish inmates, who may choose such food due to their religious beliefs.

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6. Please produce any and all documents, information and data pertaining to DOCCS food services and religious services policies, procedures, protocols towards inmates (or staff), including but not limited to its implementation, monitoring, reporting etc., towards any and all types of religious (faith) based requests and exemptions provided to staff, inmates, contractors (including but not limited to food, prayer, clothes, grooming, holidays, special occasions like Ramadan etc.).
7. Please produce any letters, emails, and communications by Defendants and any DOCCS officials (especially at DOCCS Albany and internal among leadership at 3 facilities - Gowanda CF, Fishkill CF, and Collins CF) as related to this complaint, including but not limited to Petitioner's grievances, and complaints.
8. Please produce any and all complaints, grievances, lawsuits (by staff and inmates) vs./against Defendants (named), any DOCCS employees, contractors and Senior DOCCS Officials (including but not limited to Annucci, all Deputy/Assistant and Executive Commissioners) as related to DOCCS Food Services and Religious Discrimination.
9. Please produce any and all documents, information around DOCCS Food Services and Religious Discrimination related settlements (monetary and non-monetary; reported and unreported) with inmates (pre and post release), staff and others in process or completed.
10. Please produce any and all documents, information around Defendants Job Description, Roles and Responsibilities especially around Food Services, Religious Services including but not limited to their roles in respective prisons/locations.

**/s/ Sanjay Tripathy**

Plaintiff/Petitioner ProSe

2013 Jadewood Drive,

Morrisville, NC 27560

Tel: +1-859-380-1515

Email: [sanjay.tripathy@gmail.com](mailto:sanjay.tripathy@gmail.com)

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**CERTIFICATE OF SERVICE BY MAIL(CM/ECF)**

I certify that on Monday, February 27th 2023, I mailed (CM/ECF) the foregoing Plaintiff's Request for Discovery to the Defense Counsel and Clerk of the US District Court (SDNY) via CM/ECF (ProSe Unit).

Office of the New York State Attorney General;  
Attn: **Bahiya Lawrence**, Assistant AG,  
28 Liberty Street,  
New York, NY 10005

**/s/ Sanjay Tripathy**  
Plaintiff/Petitioner ProSe  
2013 Jadewood Drive,  
Morrisville, NC 27560  
Tele: +1-859-380-1515  
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